



U.S. Department of Justice

*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

July 11, 2022

BY ECF

The Honorable Denise Cote
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: **United States v. James Velissaris, 22 Cr. 105 (DLC)**

Dear Judge Cote:

The Government and counsel for defendant James Velissaris jointly and respectfully write to propose an agreed-upon schedule governing pre-trial matters in the above-captioned case. The parties respectfully request that the Court adopt the proposed schedule below.

September 12, 2022:	Government expert disclosures due.
October 3, 2022:	Government 404(b) Notice Due Defense notice of any anticipated advice of counsel defense due
October 7, 2022:	Government produces <i>Giglio</i> and Jencks Act material <i>Note</i> – subject to defense's counsel's agreement in principle to stipulations for authenticity and/or business records
October 14, 2022:	Defense produces all Rule 16 material in its possession. Defense produces all Rule 17(c) material in its possession, that it may seek to offer or otherwise use at trial. <i>Note</i> – Defense will not offer or otherwise use at trial any material it receives in response to a Rule 17(c) subpoena that it does not produce to the Government.

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October 24, 2022: Government witness list due.

October 28, 2022: Defense expert disclosures due.

October 31, 2022: Government exhibit list due.

November 8, 2022: *dle* Motions *in limine* due.
Proposed *voir dire* due.
Proposed requests to charge due.

November 15, 2022: *dle* Oppositions to motions *in limine* due.
Oppositions to proposed *voir dire* and requests to charge due.
Trial memoranda, if any, due.

Defense produces:

- Defense witness list;
- Defense exhibits, including (a) non-impeachment exhibits to be offered through Government witnesses, or otherwise during Government's case-in-chief, and (b) any exhibits to be offered in the defense case; and
- all Rule 26.2 materials

~~November 21 or 22, 2022: Final pre-trial conference to be held at a time convenient for the Court.~~ *dle*

So ordered.

Denise Cote
7/11/22

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney
Southern District of New York

By: /s/
Daniel Loss/Margaret Graham/
Daniel Tracer
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cc: Counsel of Record (via ECF)